

Form Letter ZN:

Any analysis premised on the anticipated behavior of global coal markets should be beyond the scope of this EIS. The EIS scope should not include any impacts from the use of coal in Asia or elsewhere. Any attempt to analyze impacts from exported coal use would necessarily be based on the assumption that exporting coal from a new Longview terminal would result in an incrementally greater coal use overseas. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA.